

**KLESTADT WINTERS JURELLER
SOUTHARD & STEVENS, LLP**

Sean C. Southard
Brendan M. Scott
200 West 41st Street, 17th Floor
New York, NY 10036-7203
Telephone: (212) 972-3000
Facsimile: (212) 972-2245
Email: ssouthard@klestadt.com
bscott@Klestadt.com

*Attorneys for (i) Virtus Multi-Sector Short
Term Bond Fund, (ii) Virtus Multi-Sector
Intermediate Bond Fund, (iii) Virtus Senior
Floating Rate Fund, (iv) Virtus Multi-Sector
Fixed Income Series and (v) Phoenix Multi
Sector Short Term Bond Series*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

MOTORS LIQUIDATION COMPANY, f/k/a
GENERAL MOTORS CORPORATION, *et al.*,

Chapter 11

Case No. 09-50026 (MG)
(Jointly Administered)

Debtors.

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MOTORS LIQUIDATION COMPANY AVOIDANCE
ACTION TRUST, by and through the Wilmington Trust
Company, solely in its capacity as Trust Administrator and
Trustee,

Plaintiff,

Adversary Proceeding

Case No. 09-00504 (MG)

against

JPMORGAN CHASE BANK, N.A., *et al.*,

Defendants.

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**JOINDER OF CERTAIN DEFENDANTS IN RESPONSE
OF CERTAIN TERM LOAN LENDER DEFENDANTS TO PLAINTIFF'S
MOTION FOR SUMMARY JUDGMENT [DOCKET NO. 1097]**

Virtus Multi-Sector Short Term Bond Fund; Virtus Multi-Sector Intermediate Bond Fund, sued herein as Virtus Multi-Sector Fixed Income Fund; Virtus Senior Floating Rate Fund; Virtus Multi-Sector Fixed Income Series f/k/a Phoenix Edge SRS-Multi Sector Fixed Income Series; and Phoenix Multi Sector Short Term Bond Series, sued herein as Phoenix Edge Series Fund Phoenix Multi Sector Short Term Bond Series, (“Defendants”), through their undersigned counsel, as and for their response to the *Motion for Partial Summary Judgment Dismissing the Non-JP Morgan Term Lenders’ Effectiveness Defense* [Docket Nos.: 1085-1088] (the “Motion”), hereby join in the *Response of the Term Loan Lenders to Plaintiff’s Motion for Partial Summary Judgment on the Term Loan Lender’ Effectiveness Defense* [Docket No. 1097] and hereby join *The Term Loan Lenders’ Counter-Statement of Material Facts Pursuant to Local Bankruptcy Rule 7056-1* [Docket No. applicable, 1098], as applicable, and incorporate and adopt same as if fully set forth herein.

WHEREFORE, the Defendants respectfully request that the Court deny the Motion in its entirety and grant such other relief as the Court deems just and proper.

Dated: October 12, 2018
New York, New York

KLESTADT WINTERS JURELLER
SOUTHARD & STEVENS, LLP

By: /s/ Brendan M. Scott
Sean C. Southard
Brendan M. Scott
200 West 41st Street, 17th Floor
New York, NY 10036
Tel:(212) 972-3000
Fax: (212) 972-2245
ssouthard@klestadt.com
bscott@klestadt.com

Attorneys for Defendants